

OCT 23 1997

RCRA PERMITTING & COMPLIANCE BRANCH
(RPCB)

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office

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August 7, 1997

William Reckel
Amteco Inc.
1100 Jefferson Dr.
Pacific, MO 63069

Dear Mr. Reckel,

L.O.W. #97-SL.041

This is a Letter of Warning (L.O.W.) resulting from a July 29, 1997, hazardous waste inspection of Amteco Inc. conducted by Mr. Paul Morris of my staff. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Waste Management Law (1977) as amended.

Please review the attached Inspection Record and Checklist used by the inspector during the visit. Circled citations on the checklist indicate violations noted during the inspection. The comments section of the checklist and this letter document the observations and information obtained by the inspector during the inspection.

In order to ensure the facility returns to compliance, the following is required:

1. Contact Scott Huckstep at the Hazardous Waste Program to obtain a new ID number for the new facility site. The enclosed Notification of Regulated Waste Activity form must be forwarded to the Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102. Section VIII A)1. of the form determines Amteco's generator amounts.
2. Amteco must certify that the storage container has been properly marked per 40 CFR 262.32 and all containers used in the future to store hazardous waste will be so marked.
3. Amteco must mark all storage containers with the beginning date of accumulation. This serves to ensure that containers do not remain in storage past the allowable time period. Certify that storage containers have been marked and all containers used in the future to store hazardous waste will be marked with beginning date of accumulation.
4. Provide, at a minimum, an absorbent material to contain a spill should one occur and safety equipment. Certify that these items are available near the waste handling area. Submit a list of spill control and safety equipment.



RECYCLED PAPER



R00148196
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5. An alarm or similar device capable of summoning emergency assistance must be located at the storage area. Certify a device has been installed at the storage area.
6. Amteco must certify that their Generator's Missouri I.D. number will be on all future manifests.

Amteco's status for Resource Recovery Certification is based on the amount recycled through the distillation equipment and not on hazardous waste generated per month for shipment. Amteco's resource recovery system recycles less than 200 kilorams per month and therefore is currently an exempt resource recovery facility because it is below the 1000 kilograms/month limit for on site recovery.

In order to document corrective actions have been taken, you are requested to submit a written response no later than August 21, 1997. The response should describe the actions taken and/or a schedule for completion of necessary action to correct the violations identified. Please direct the response to Mr. Morris' attention. You should also forward a copy of your response and supporting documents to Ms Kathy Flippin, Chief - Enforcement Section, Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102. Should you have any questions or wish to confer in this matter, please contact Mr. Morris.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S. P. Eck
Regional Director

RSPE/PHM/cm


Enclosure

c: HWP Enforcement - Kathy Flippin



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME Amteco, Inc.		DATE 7-29-97	EPA I.D. NUMBER MO0000063669
ADDRESS 1100 Jefferson St.		RR NO. none	MO I.D. NUMBER 026061
CITY Pacific	NUMBER OF EMPLOYEES 8	YEARS AT SITE 2 years	TELEPHONE NUMBER 314-271-1300
FACILITY REPRESENTATIVE(S), TITLE(S) Sandra Boewer, Steve De la Roche			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Amteco, Inc. is a manufacturer of wood preservatives /sealants, rust primers, varnishes and some industrial coatings and latex paints. Amteco moved from its former location in St. Louis to a site in Pacific, MO in 1995. The facility only operates a day shift and most of the production is from March ~~to~~ October due to seasonal product demand. Amteco employs about 8 people for its operation and temporary help during the summer months. The facility generates off specification product on an infrequent basis. Most off specification product is reworked into another batch process. Some products have been discontinued during the transition to the new site partly because they generated more hazardous waste. Large quantities of these products were manifested as waste in 1994 and 1995. The only regular generation of waste is still bottoms from their solvent recovery distillation unit. The still bottoms drum collects up to 100 pounds in a 6 month period. Amteco could be considered a conditionally exempt generator if this is its only waste and less than 220 pounds per month of off spec product is manifested as hazardous waste. Currently, this facility acts as small quantity generator and sends in quarterly generator's summary reports.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Still bottoms from Solvent Distillation	200 P per year	D001 F003 F005	
2. Off Spec. waste paint	3240 G per year	D001, F003 F005	
3.			
4.			
5.			

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |

A. GENERAL

<input type="checkbox"/>	Registered as a HW Generator - Section 260.380(a) - 10 CSR 25-5.262(1)(a)	GOR
<input type="checkbox"/>	Facility determines if waste is hazardous - 10 CSR 25-5.262(1)(b) incorporating 40 CFR 262.1	GOR
<input type="checkbox"/>	Utilizes a licensed hazardous waste transporter - Section 260.380(b) - 10 CSR 25-5.262(1)(c)	GOR
<input type="checkbox"/>	Utilizes authorized HW/TSO/RR facility - Section 260.380(c) - 10 CSR 25-5.262(1)(d)	GOR
<input type="checkbox"/>	Facility does not operate as a TSO - Section 260.390(c) - 10 CSR 25-5.262(1)(e)	GOR

COMMENTS

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE

<input type="checkbox"/>	Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1)(f) incorporating 40 CFR 262.34(a)	GOR
<input type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1)(g) incorporating 40 CFR 262.34(b)(2) referencing 40 CFR 265.174	GOR
<input type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1)(h) incorporating 40 CFR 262.34(b)(2) referencing 40 CFR 265.174	GOR
<input type="checkbox"/>	Containers closed in storage - 10 CSR 25-5.262(1)(i) incorporating 40 CFR 262.34(b)(2) referencing 40 CFR 265.174	GOR
<input type="checkbox"/>	Containers storing incompatible waste separated or protected from each other by a barrier - 10 CSR 25-5.262(1)(j) incorporating 40 CFR 262.34(b)(2) referencing 40 CFR 265.174	GOR
<input checked="" type="checkbox"/>	Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)3.	GOR
<input checked="" type="checkbox"/>	Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	GOR
<input type="checkbox"/>	Date of accumulation marked on containers - 10 CSR 25-5.262(1)(k) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
<input checked="" type="checkbox"/>	Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR
<input type="checkbox"/>	Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1)(l) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
<input checked="" type="checkbox"/>	Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT
<input checked="" type="checkbox"/>	Daily inspection of areas subject to spills, i.e. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
<input checked="" type="checkbox"/>	Adequate aisle space is available - 10 CSR 25-5.262(1)(m) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
<input checked="" type="checkbox"/>	Placards available for transporter - 10 CSR 25-5.262(1)(n) incorporating 40 CFR 262.33	GPT
<input checked="" type="checkbox"/>	"No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
<input checked="" type="checkbox"/>	Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

One drum of hazardous waste near resource recovery equipment did not have the beginning date of accumulation on it.

One drum near resource recovery distillation area was not marked "Hazardous Waste"

C. SATELLITE ACCUMULATION

<input type="checkbox"/>	Containers kept closed - 10 CSR 25-5.262(1)(p) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.174	GPT
<input type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1)(q) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.174	GPT
<input type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1)(r) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.174	GPT
<input type="checkbox"/>	Quantities accumulated not exceeding 55 gal. (1 quart of acutely hazardous wastes) - 10 CSR 25-5.262(1)(s) incorporating 40 CFR 262.34(c)(1)	GPT
<input type="checkbox"/>	Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1)(t) incorporating 40 CFR 262.34(c)(3)	GPT
<input type="checkbox"/>	Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR

COMMENTS

NA

7. <input type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS
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D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated not maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS Spill control and safety equipment was not located near the hazardous waste storage area. A device for summoning assistance, such as a horn or alarm was not located in the hazardous waste operation area.
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265 Subpart C.	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. NA				
2.				
3.				

1. <input checked="" type="checkbox"/> Uncovered tanks have 2" thick boards of containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Continuously or intermittently equipped with detection of system or proper bypass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT	
3. <input checked="" type="checkbox"/> Waste and/or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT	
4. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)	GPT	
5. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/proTECTED from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(1)	GPT	
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(a)(2)	GPT	
7. <input checked="" type="checkbox"/> Volatiles with vapor pressure > 760 mm Hg @ 25 °C not placed in open tanks - 10 CSR 25-5.262(2)(C)2(b)(i)	GOR	
8. <input checked="" type="checkbox"/> Wastes and residues removed from tank and equipment and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT	
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT	

PART 2: RECORDS INSPECTION

no ^{id} generator number was not on the
out of state manifest for 1995

COMMENTS

NA

I. RESOURCE RECOVERY

1. <input type="checkbox"/> RR certification or permit, recovery, or treatment of waste oil or hazardous waste on site - 10 CSR 25-9.020(1)(A)	GOR
2. <input type="checkbox"/> Still bottoms or RR residue - disposed of properly - Section 264.860 - 40 CFR 264.860	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

COMMENTS

10 drums put through / yr.

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

DATE

ant R. Morin

7-30-97